

Regional Housing Needs Allocation
The Subregional Option



ABAG convenes informational meeting on RHNA Subregions – June 16



50 attendees, 4 staff, 1 computer



Many seek an A/B comparison of the allocations under ABAG and under a subregion



Some believe subregions will yield a “Better” allocation



ABAG Will Conduct the Regional Housing Need Process (RHNA) for Bay Area



Local Governments May – But Are Not Required to – Form Subregions



ABAG Will Delegate Responsibility for Conducting RHNA at the Subregional Level (SubRHNA) to Subregions If they Form.



ABAG Will Continue to Conduct RHNA for the Balance of the Region



ABAG Is Required to Allocate a Share of the Regional Housing Need – Including Affordability Categories - to Each Subregion in a Proportion Consistent with the Distribution of Households Assumed for the Comparable Time Period of the Applicable Regional Transportation Plan.



Subregion Is Required to Use Data Developed by ABAG – Otherwise It Will Conduct SubRHNA On Its Own



Each Subregion Is Required to Fully Allocate its Share of the Regional Housing Need to Local Governments within the Subregion.



ABAG Will Allocate Subregion's Share if Subregion Fails – Method TBD

Formation of Subregions - Who?

Govt. Code Section 65584.03(a) States:

At least 28 months prior to the scheduled housing element update required by Section 65588, **at least two or more cities and a county, or counties**, may form a subregional entity for the purpose of allocation of the subregion's existing and projected need for housing among its members in accordance with the allocation methodology established pursuant to Section 65584.04. The purpose of establishing a subregion shall be to recognize the community of interest and mutual challenges and opportunities for providing housing within a subregion. A subregion formed pursuant to this section may include **a single county and each of the cities in that county** or **any other combination of geographically contiguous local governments** and shall be approved by the adoption of a resolution by each of the local governments in the subregion as well as by the council of governments.

Does this Mean:

- At least two or more cities and a county, or counties may form a subregion and
 - A subregion may include a single county and each of the cities in that county and
 - A subregion may include any other combination of geographically contiguous local governments?
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- ★ ***ABAG Will Conditionally Defer to Local Governments' Judgment on this Issue***

Formation of Subregions - How?

- ➡ Each Local Government in Subregion Adopts Approving Resolution
- ➡ ABAG Adopts Approving Resolution
- ➡ Subregion Makes Decisions Based on “rules adopted by the local governments comprising the subregion or shall be approved by vote of the county or counties, if any, and the majority of the cities with the majority of population within a county or counties.”

Department of Housing & Community Development (HCD) Timeline

Schedule for ABAG Regional Housing Needs Allocation

Regional Allocation Deadlines		Allocation Deadlines if Subregional Option Used	
		2006	
April 30	ABAG/HCD consultation on region's share of statewide housing need [65584.02(b)]		
June 30	ABAG requests information from jurisdictions for developing methodology [65584.04(b)(1)]		
		August 31	Deadline for creating subregional entities [65584.03(a)]
December 31	ABAG develops a proposed methodology [65584.04(a)]. Start of 60-day public comment period about methodology [65584.04(h)]; must include at least one public hearing [65584.04(c)]	December 31	The subregion develops a proposed methodology [65584.04(a)]. Start of 60-day public comment period about methodology [65584.04(h)]; must include at least one public hearing [65584.04(c)]
		2007	
January – March	ABAG adopts a final methodology [65584.04(h)]	January – March	Subregion adopts a final methodology [65584.04(h)]
March 1	HCD determination of regional housing need [65584.02(a)(1)]		
		May 1	ABAG determination of housing need assigned to each subregion. At least one public hearing must be held prior to allocation [65584.03(c)].
Prior to June 30	ABAG issues DRAFT RHNA [65584.05(a)].	Prior to June 30	Subregion issues DRAFT RHNAs [65584.05(a)].
Prior to June 30	ABAG reviews DRAFT RHNAs of subregions for compliance with Gov. Code Sec. 65584.03(d); if noncompliant, ABAG completes allocation process for affected jurisdictions		
Prior to August 31	Local jurisdictions may request revisions to DRAFT allocation [65584.05(b)]	Prior to August 31	Local jurisdictions may request revisions to DRAFT allocation [65584.05(b)]
Prior to October 31	ABAG responds to revision requests (within 60 days of submittal) [65584.05(c)]	Prior to October 31	Subregion responds to revision requests (within 60 days of submittal) [65584.05(c)]
December – February	Local jurisdictions may appeal DRAFT RHNA (60 day period)	December – February	Local jurisdictions may appeal DRAFT RHNA (60 day period)
		2008	
January- Feb.	Continuation of 60 days for Local jurisdictions to appeal DRAFT RHNA	January- Feb.	Continuation of 60 days for Local jurisdictions to appeal DRAFT RHNA
January – April	ABAG public hearing on appeals (within 60 days after deadline for filing appeal) [65584.05(e)].	January – April	Subregion public hearing on appeals (within 60 days after deadline for filing appeal) [65584.05(e)].
February – April	ABAG issues FINAL RHNA proposal (within 45 days of end of 60-day appeals period) [65584.05(f)].	February – April	Subregion issues FINAL RHNA proposal (within 45 days of end of 60-day appeals period) [65584.05(f)].
February – June	ABAG public hearing to adopt FINAL allocation (within 45 days of issuing final allocation) [65584.05(h)]. Submit adopted Final Allocation to HCD.	February – March (prior to ABAG's)	Subregion public hearing to adopt FINAL allocation (within 45 days of issuing final allocation) [65584.05(h)]. Subregions submit FINAL allocations to ABAG
August	HCD completes review of FINAL RHNA [65584.05(h)].		
		2009	
June 30	Adopted Housing Element updates due to HCD, preceded by submittal of draft elements		

Notes: This task schedule supercedes the due dates that would be applicable if the process were to be implemented pursuant to Section 65584 rather than pursuant to Section 65584.02. The planning period for the housing element updates will be July 1, 2009 through June 30, 2014. The allocation period for the regional housing need for the ABAG region will be January 1, 2006 through June 30, 2014; these dates represent the date for which the most current estimates of local housing stock will be available from the Department of Finance (DOF), and the end of the planning period, respectively.

Delegation Agreement

- Open Issues -

- ◇? When Will Agreements Be Signed?
- ◇? If Subregion Fails to Carry out SubRHNA at any point in the process, ABAG is Required to Allocate. Critical points in SubRHNA are:
 - (1) Adoption of Subregional Methodology
 - (2) Issue Initial Draft Allocations [Subject to ABAG Review]
 - (3) Issue Revised Draft Allocations
 - (4) Issue Final Allocations
- ◇? What Methodology Will ABAG Use to Allocate If Subregion Fails at a Critical Point?
- ◇? Will the Methodology be the Same at all Critical Points?
- ◇? Will the Subregional Share be “Mixed” with the Regional Share? Will this Decision be the Same at all Critical Points?

